

Mark E. McKane, P.C. (SBN 230552)  
Michael P. Esser (SBN 268634)  
**KIRKLAND & ELLIS LLP**  
555 California Street  
San Francisco, CA 94104  
T: (415) 439-1400 / F: (415) 439-1500  
mark.mckane@kirkland.com  
michael.esser@kirkland.com

David R. Seligman, P.C. (admitted *pro hac vice*)  
**KIRKLAND & ELLIS LLP**  
300 North LaSalle  
Chicago, IL 60654  
T: (312) 862-2000 / F: (312) 862-2200  
dseligman@kirkland.com

Aparna Yenamandra (admitted *pro hac vice*)  
**KIRKLAND & ELLIS LLP**  
601 Lexington Avenue  
New York, NY 10022  
T: (212) 446-4800 / F: (212) 446-4900  
aparna.yenamandra@kirkland.com

*Counsel for Calpine Corporation, et al.*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

In re:  
  
PG&E Corporation, Pacific Gas & Electric  
Company,  
  
Debtors.

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric  
Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)*

Chapter 11  
  
Case No. 19-30088 (DM)  
  
(Lead Case)  
(Jointly Administered)

**NOTICE OF MOTION FOR ORDER  
AUTHORIZING WITHDRAWAL OF  
COUNSEL**

1 PLEASE TAKE NOTICE that Calpine Corporation, on behalf of itself and its subsidiaries,  
2 including without limitation, Russell City Energy Company, LLC, Los Esteros Critical Energy Facility,  
3 LLC, Geysers Power Company, LLC, Gilroy Energy Center, LLC, Creed Energy Center, LLC, and Goose  
4 Haven Energy Center, LLC (collectively, "Calpine"), hereby moves this Court for an Order Authorizing  
5 Withdrawal of Counsel in the above-captioned chapter 11 cases. This motion (the "Motion") is pursuant  
6 to the applicable Rules of Procedure and is based upon this notice, the Motion, the Declaration of  
7 Ameneh M. Bordi, and the pleadings and documents filed in this case.

8 PLEASE TAKE FURTHER NOTICE that, in accordance with Bankruptcy Local Rule  
9 9014-1(3)(A), any objection to the requested relief, or a request for hearing on the matter, must be filed  
10 with the Clerk of Court and served upon the initiating party within 21 days of mailing the notice;

11 Any objection or request for a hearing must be accompanied by any declarations or memoranda of  
12 law any requesting party wishes to present in support of its position;

13 If there is no timely objection to the requested relief or a request for hearing, the Court may enter  
14 an order granting the relief by default; and

15 In the event of a timely objection or request for hearing, the initiating party will give at least seven  
16 days written notice of the hearing to the objecting or requesting party and to any trustee or committee  
17 appointed in the case.

1 DATED: January 28, 2021

KIRKLAND & ELLIS LLP

3 By: /s/ Michael P. Esser

4 Mark E. McKane, P.C. (SBN 230552)

5 Michael P. Esser (SBN 268634)

**KIRKLAND & ELLIS LLP**

555 California Street

San Francisco, CA 94104

Telephone: (415) 439-1400

Facsimile: (415) 439-1500

mark.mckane@kirkland.com

michael.esser@kirkland.com

9 David R. Seligman, P.C. (admitted *pro hac vice*)

**KIRKLAND & ELLIS LLP**

300 North LaSalle

Chicago, IL 60654

Telephone: (312) 862-2000

Facsimile: (312) 862-2200

dseligman@kirkland.com

13 Aparna Yenamandra (admitted *pro hac vice*)

**KIRKLAND & ELLIS LLP**

601 Lexington Avenue

New York, NY 10022

Telephone: (212) 446-4800

Facsimile: (212) 446-4900

aparna.yenamandra@kirkland.com

17 *Counsel for Calpine Corporation, et al.*